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*Counsel for Plaintiffs*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

MDL No. 3084 CRB

Honorable Charles R. Breyer

This Document Relates to:

*V.B. vs. Uber Technologies, Inc., et al.,  
3:25-cv-06705;*

*M.W. vs. Uber Technologies, Inc., et al.,  
3:25-cv-05474; and*

*E.B. vs. Uber Technologies, Inc., et al.,  
3:24-cv-07491*

**DECLARATION OF DOUGLAS  
GRUBBS IN SUPPORT OF PULASKI  
KHERKHER, PLLC'S MOTION TO  
WITHDRAW AS COUNSEL OF  
RECORD**

I, Donald Douglas Grubbs, declare:

1. I am an attorney with the law firm of Pulaski Kherkher, PLLC (hereinafter "PK" or "firm"). I am a member of the State Bar of Texas and am admitted to practice *pro hac vice* before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. On August 21, 2025, I met and conferred with opposing counsel regarding the validity of the above-referenced Plaintiffs' ride receipts. In the days prior to the meet and confer, I had re-reviewed the ride receipts that Plaintiffs had provided during the case intake process. During

1 the meet and confer zoom, I advised opposing counsel at Shook, Hardy & Bacon of my firm's  
2 intention to withdraw should the above-referenced Plaintiffs fail to provide additional ride  
3 receipt proof.

4         3. Relying on Defendants' representations during our meet and confer zoom, I emailed  
5 the above-referenced Plaintiffs the afternoon of August 21, 2025 explaining Uber's concerns  
6 and requesting that Plaintiffs provide my firm with any additional proof of their ride at issue,  
7 *e.g.*, the email that Uber typically sends upon ride completion.

9         4. My firm followed up with the above-referenced Plaintiffs via telephone and email on  
10 August 29, 2025, *i.e.*, the date after Defendants filed their second motion to show cause (ECF  
11 3784). On September 2, 2025, my firm also mailed correspondence via 2-day Federal Express  
12 giving Plaintiffs until September 9, 2025 to provide any additional proof otherwise my firm  
13 would initiate the process of withdrawing as their attorneys.

15         5. At the time of filing this declaration, no additional ride receipt proof has been provided  
16 by the above-referenced Plaintiffs nor substitute counsel identified.

17         6. My firm has taken reasonable steps to protect the interests and avoid any prejudice to  
18 the above-referenced Plaintiffs by informing them of their options and consequences of failing  
19 to respond or provide ample time to produce additional proof of the Uber ride at issue. PK's  
20 withdrawal from these cases will not impact the timing or schedule of this litigation.

22         7. I understand that pursuant to Local Rule 11-5(b) that leave to withdraw may be  
23 conditioned on my firm continuing to accept papers to forward to Plaintiffs and accept this role  
24 should the Court require.

25         8. A courtesy copy of this declaration will be served upon the above-referenced Plaintiffs  
26 at their last known address and via electronic mail.

27 Executed on September 10, 2025 in Houston, Texas.

1 Dated: September 11, 2025

Respectfully submitted,

3 **PULASKI KHERKHER, PLLC**

4 /s/ D. Douglas Grubbs

5 D. Douglas Grubbs (TX Bar No. 24065339)

6 (*Admitted Pro Hac Vice*)

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9 Counsel for Plaintiffs

**CERTIFICATE OF SERVICE**

I hereby certify that on September 11, 2025, I electronically transmitted the foregoing DECLARATION OF D. DOUGLAS GRUBBS IN SUPPORT OF PULASKI KHERKHER, PLLC'S MOTION TO WITHDRAW AS COUNSEL OF RECORD to the Clerk's office using the CM/ECF system for filing thereby transmitting a Notice of Electronic Filing to all CM/ECF registrants. Additionally, the foregoing was served on Defendants' counsel via email at: [ubermdlservice@listserv.shb.com](mailto:ubermdlservice@listserv.shb.com).

/s/ D. Douglas Grubbs  
D. Douglas Grubbs